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FOI/PA
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FOI/PA# 1347822-000

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Memorandum



To : SAC, WMFO (74-330) (P) (C-2)

Date 8/30/88

From : SA [redacted]

b6
b7C

Subject : [redacted]

OO:WMFO

The following sub files have been created to standardize and administrate the captioned investigative matter. Additional sub files may be created as the need arises.

A copy of this memorandum should be maintained as the top serial in each sub file.

SUB D: News articles and NEXIS printouts

Testimony and other statements of or relating to:

SUB G:

SUB H:

SUB I:

SUB J:

SUB K:

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⑨-Washington Field (74-330)

[redacted]

(9)

Maintain as Top Serial
Do Not Cancelize

74-330-MAIN

[redacted]

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[redacted]

74-330-11

SEARCHED	INDEXED
SERIAL	
MAY 18 1988	
FBI - WASH. FIE	

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et al

74-330

Field File No.

74-330 -2

Serial # of Originating Document

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Date Received

From

(Name of Contributor)

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By

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Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules of Criminal Procedure ☐ Yes ☐ No

Title:

[Redacted]

et al

PERJURY

OO: WMFO

Reference:

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

[Redacted]

9/20/88

[redacted]

[redacted]

[redacted]

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[redacted]

atty,

[redacted]

9/20/88

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① [redacted] - prior proc atty; friend of [redacted]
[redacted] I tried to use to get [redacted] to
talk re DOJ [redacted] pressure on US T^s the Doctors,
Feels that [redacted] may have told her re pressure, as he did the Doctors,
re that's what he believed at time.

② [redacted] dep't refused to pressure; but he
had wrong case (eg referred to shareholder's
cmttee). Once realized his mistake,
recanted his testimony. Once [redacted] learned
of this, called [redacted] atty re discip. Whif.
not re [redacted] to contact [redacted] But [redacted] did,
+ [redacted] realized his mistake +
issued an affidavit recanting.

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③ [redacted] called AVSA [redacted] SONY,
why rep [redacted] at depo. [redacted] advised that
had been a mistake, had spoken to [redacted]
atty, + why despatch [redacted] spoke w/.

[redacted]

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OO and File No. WF 74-330-2

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By

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☐ Yes ☒ No

Title:

et al
Possible Perjury
OO: WMFO

Reference: _____

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

10/19/88

b6
b7C

74-330-1A 2

10/19/88

[redacted]
[redacted]

RA [redacted]

b6
b7C

etc.
(see card).

6N.

[redacted]
[redacted]

b6
b7C

2/85

As [redacted] - [redacted]
Rep/Proper in Wn to be kept
already of ongoing cases. Wn has some
operational authority, since he is also the
[redacted] EOUST as well as Wn.

DOJ Reps gave more flexibility to [redacted]
Dn EOUST [redacted] super cases than in
EOUS A.

Wn's recall [redacted] interf in any
case. Reacted to things that happened,
but doesn't recall any incidents where
[redacted] directly interfered.
But admits, he did interfere.

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Re contact w/ [redacted], re INSLAW,
just of all, [redacted] was not involved. [redacted]
called re what was it about; Pkg of
docs re the I br was sent over
to EOUST. Sure that didn't know
anything about case before that.

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Talked to [redacted] debtors'
counsel. [redacted] reported back to EO; was
sure whether spoke to [redacted] or someone
else. [redacted] either [redacted]

[redacted]

No further inv. w/ case until [redacted]
of motion by [redacted]

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impose curfew order, bec DOJ was both a creditor + a Tee. Upset at seeing this, hee was a criticism of his office. Told [] + his staff that w/ no problem. Ordered staff not to release non-pub. info. [] asked for a narrow, precise order. Pres order made it very clear as to who cd see the I file.

That was end of involvement re I matter until civil suit came up.

Re [] issue: [] was mentor in - in; helped get feel in being US Tee. Spoke to each other periodically, + regularly.

Recalls telcall, that [] indicated that [] directly called [] Curves. [] re [] coming to Wash to do something re I. I may have misunderstood, but thought that [] wd do something at Main J. Thought it was S trying to carry over by having [] available.

But since both DOJ civil dir + US Tees knew how to ~~for~~ file motions to compel a depositions, cdn't understand purp of [] coming to Wash. Also unusual bec I was not a big case - no unusual admin problems; one of many Chr II cases.

Doesn't ever remember [] ever discuss[] w/ him. Never brought it to [] attention. Never heard anything else re [] coming.

~~NO~~ No recollection that [] said that []
being sent to court I, [] was
not going to allow to happen. Both
felt very strongly, but it did not come
to pass. ~~Had~~ Had it come to fruition, we
would have taken issue to A-6. ~~and~~

b6
b7C

[] even suggests resigning over issue
he wanted to preserve integrity of
programming.

~~From~~
Covers w/ [] re [] was before
prob order was issued.

b6
b7C

From Spring 85 to depositions in
3 & 4 / 87, had no contact re I.

Deposed 3/23/87. I atty []
served [] w/ 2^d ~~subpoena~~ subpoena. Said was a
~~subpoena~~ ^{threatened} ~~subpoena~~ ^{not} ~~subpoena~~ ^{not}
[] called [], said was subpoenaed.
again & was a copy of inter. [] said
was giving another depo, & said we
get back to me.

b6
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[] & [] said []
testimony different from []. No substantial
cover w/ [] until he read ^{me} his
transcript verbatim when I called him.

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As [] read his transcript over
phone, [] told him that's not what
happened. No one []
[] would tell [] what incense was.
Recalls that [] wanted to read
depo exactly. Recalls testimony re
"IRS measure to convert." Told
[] that "that's not the way it happened"

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b7C

ul notes that notion to cover is a daily occurrence in my work. Covering is a judicial decision; but not to cover occurs all the time

When told [] that was mistaken, [] agreed. There was other testimony that was not accurate re I [] showed [] that had it confused w/ ~~the~~ VPI case. May have discussed [] need to cover. Q may have come up re whether [] sd cover.

[] specif states that ~~he~~ called [] to lobby & hear re charges needed.

Doesn't recall talking to [] any further re I.

~~He~~ [] had confused VPI w/ I, because VPI was a big case, quickly done w/in 12 mos. Near beg of case, a ~~lot~~ ^{att} atty said that "was 11s den & record," so let let's liquidate." [] cited this to [] as example where Tees did not side w/ Govt.

Believes that VPI filing was around same time as I. Handled personally. May have spoken w/ IRS atty re conversion, but never got any pressure.

did not have freq disc. w/ Ass't Tees re I.

[]

[] was terribly upset re how
being treated by [] [] wanted to get
reborn in NY employment.

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Does not recall telling [] that
EO was obsessed w/ I.

[] was getting strange. Felt ~~that~~ was
cutoff from many EO activities, phone
tapped, etc.

The notes shown in I file, in
response to attempts to get
information for [] doesn't recall
speaking to [] during I.

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Serial # of Originating Document 74-330-(3)
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By _____
(Name of Special Agent)

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Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules
of Criminal Procedure ☐ Yes ☐ No

Title: _____

Reference: _____
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

10/20/88

b6
b7C

b6
b7C

10/20/88

[redacted]

b6
b7C

Knows [redacted] since [redacted] came up [redacted]
[redacted]
[redacted]

sees 2-3 x/yr. @ prof functions. No social relship outside.

Has not had conv w/ [redacted] re pressures to covert cases; no pressure re intakes w/ EOUST.

b6
b7C

Has known [redacted] since were employed at [redacted]. Has dropped in 2-3 times for lunch. At one lunch, [redacted] and [redacted] attended. Has no recollection that subj of I ever came up.

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b7C

Recalls that [redacted] sat on couch talking while [redacted] finished up. paperwork. Has no idea re what they talked about. [redacted] did have probe w/ his superiors. Did make known to someone his concerns, re probe.

Field File No. WF 74-330-1A-4

Serial # of Originating Document _____

OO and File No. _____

Date Received _____

From _____
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(ADDRESS OF CONTRIBUTOR)

By SA [Redacted]
(NAME OF SPECIAL AGENT)

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Grand Jury Material - Disseminate Only Pursuant to
Rule 6(e), Federal Rules of Criminal Procedure
☐ Yes ☐ No

Title: [Redacted], et al
POSSIBLE PERJURY
OO: WM FO

Reference: _____
(Communication Enclosing Material)

Description: ☒ Original notes re interview of
[Redacted]

b6
b7C

10/20/88

b6
b7C

10/20/88 ✓
[redacted]
%a Tues before dep, [redacted] rec'd call from [redacted] chrs. [redacted] was asked to give dep testimony in I case. Called [redacted] her one of 2 by attys in USA of. Rec'd auth to rep [redacted] her being repres as her ee of DOJ.

Hadn't rec'd adeq CFK stnd from I attys. Called ED US Tee of, & rec'd perm to make [redacted] available.

~~So~~ Interview [redacted] briefly. Rec'd genl overview of I.

I atty [redacted] atty named [redacted] [redacted] gave his dep testimony & was relatively quick. Recalls [redacted] saying that was asked to send [redacted] to Wash, & thought w'd result to [redacted] to send [redacted] to Wash.

Next ~~day~~ ^{morning}, rec'd call from DOJ atty [redacted] [redacted] said [redacted] testimony was wrong, & DOJ concerned that sd get something to [redacted] to indicate the error. Then spoke w/ [redacted] on phone. [redacted] stated his testimony was wrong, & wanted to correct his error. ~~He advised~~

[redacted] was sched to receive trans that morning. [redacted] wd then send it to [redacted]

[redacted] ~~that~~ [redacted] met w/ [redacted] in at least 2 hrs & asked him what happened. [redacted] said he called [redacted] right after dep, (reting [redacted] call from several days prior) & [redacted] told him re his testimony. [redacted] said

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b7C

to [] "think about that, that
isn't I." Recalls [] said he read
portraits of Trauser to [] then
convinced he made a mistake.

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b7C

[] then went through the entire
transcript & reviewed ~~every~~ all [] testin'.
Affid stated that everything [] ^{said} was
true to [] ~~to~~ knowl; but after further
reflec & speaking to [] he now realizes
that he had I confused w/ VPI case.
[] send signed affid to []

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b7C

~~Had~~ no further contact w/ I until
[] was deposed again. This depo took
place in [] This ~~depo~~
~~transcript~~ was reviewed by []
w/ no changes.

b6
b7C

Later, [] repres [] also as a
depo

After "Barnes" article, rec'd call
from [] on behalf of I. Wanted
to talk to [] again. Sensed not
anxious to accuse [] of perjury. []
made an affic req for repres, or
curer w/ I req to interview him
but not sure what happened to
request.

b6
b7C

[] reiterates that when [] called re
[] discop in testin' [] did not sugges
what testin sb. Rather, concerned b/c of
thing, it leaves coming up unred
thereafter, [] sugges a letter, but
[] decided to go w/ affid.

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b7C

+ signed

Field File No.

WF 74-330-1A-5

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Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules of Criminal Procedure ☐ Yes ☐ No

Title:

POSSIBLE PERJURY
OO: WMFO et al

Reference:

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

with xerox of envelope attached. 10/21/88

b6
b7C

10/21/88

?

[redacted]
[redacted]
[redacted] Has known [redacted] since 1976, as a [redacted] Used [redacted] rolls for pol contributions, + assumed [redacted] knew her from that. [redacted]

b6
b7C

3/18/87 - msg on ans mach from [redacted] (NY civil is can't make L1) phone calls). Planned to go to [redacted] [redacted] was atty-friend who she req to call [redacted] + have him call her.

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b7C

He ~~said~~ called, + # know [redacted] [redacted] wanted to talk w/ [redacted] + cd sho sed it up. [redacted] was not a pers friend, but merely an acquaintance.

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b7C

Told [redacted] that has a ph # for [redacted] chambers, but tell me what you want to talk to [redacted] about. Mark votes in envelope (referred to envelope).

Notes refreshed her recollection: [redacted] referred by Mitchell & Tweed.

When [redacted] [redacted] of I were friends. Cove I people wanted it closed to steal software.

b6
b7C

~~etc.~~ etc.

[redacted] went thru alley re [redacted] [redacted] pressed [redacted] to send [redacted] to Mach. to cover I.

[redacted] called [redacted], related substance of [redacted] telecall, + advised re whether a [redacted] wanted to talk to [redacted] [redacted] said re pressure to cover [redacted] said he "had heard it,

b6
b7C

Re concern that msg of to closing I was about software I #

[] concludes that [] was agreeing with other [] alleg of C.D. b6 b7C

but didn't know it. " re what [] had told [] who told []
Only thing he can't agree with, is that, [] said he did not discuss it w/ []
[] said it all came from [] meeting with [] b6 b7C

[] said he talked to [] when he was told to send somebody down. [] said we don't have standing to send anyone down. b6 b7C

[] had queried [] re whether [] told [] to send [] to WDC [] ans. that it may not have been anyone who passed [] b6 b7C

[] said he wd refuse to send [] to black. b6 b7C

[] not happy re [] recantation - she repes a small creditor in UPI. [] has doubts that [] got UPI confused with FNSLAW.

[] recently Has given info to [] of Senate Sub committee on Invest'g. b6 b7C

Jash
Spec ques of [] re [] (etc) b6 b7C
1) Had [] contacted [] directly to send [] to Wash? A: [] had messaged [] asked [] to send []
[] didn't know who had asked [] May not have been anyone.

3/18/87

det for - contractor
for organizing
prosecutors of /ies

was
source

Will any
asked to send

[redacted] to DC

on /nslaw case

called [redacted] about
[redacted] call

referred
to [redacted]

supposed to have asked
DE/ha US T'es to convert
case to [redacted] referred
[redacted] US T'es

to [redacted]

did [redacted]
tell who asked
him - may not [redacted]

[redacted]

matter referred by [redacted]
[redacted]
when [redacted]
was in Justice
[redacted]

HOLM KESSEL FRIED KESSNER & O'HARA
THE GRAYBAR BUILDING
420 LEXINGTON AVENUE
NEW YORK, NEW YORK 10170

working
for [redacted]

parents of [redacted]
were friends
of [redacted]

concern Justice
Dept. want it closed
heard it not known
[redacted] to [redacted]
[redacted] [redacted]
[redacted] [redacted]

only
thing
can
disagree
with [redacted]

came from
[redacted]
disc [redacted]
crazy thing

New York City, New York 10013

[redacted]
not

[redacted]

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when [redacted]
to [redacted]

down
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Dep't
for Justice

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74-330-1A-5

Field File No. _____

Serial # of Originating Document

WF 74-330-1A-6

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Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules
of Criminal Procedure ☐ Yes ☐ No

Title: _____

Reference: _____

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

11/3/88

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b6
b7C

PRW
E C

302

11/3/88

b6
b7C

[] exercise v. little control over NY ops.
Bec was v. little prod w/ NY ops, [] use^{b6}
to travel to other ops. ^{b7C}
Wd send info^{b6} mostly re ops request.
Occas wd send info^{b6} re high visit cases.

Never had ~~an~~ interfer from ED re
case request.

[] send [] to NY in approx 1 year
to interview & learn ops request. [] after^{b6}
did this in new US Pres. ^{b7C}

± know [] prior to [] coming to
NY to learn ops request. After his
try, [] wd call [] frequently to discuss
cases & request.

Not sure when hist heard of T;
believes he & [] discussed T as many
matters. Recalls one situation^{b6}
where parties wanted to exclude [] from^{b7C}
access to info. [] advised that as Tex
[] can't allow that to happen. Urged
him to bring notion to maintain access
w/ security agreeable to parties.

Early 1985, [] decided to apply to be
[] Design [] to run office here^{b6}
believed he'd [] wanted ops control^{b7C}

(2)

I allowed [] to become familiar w/ []
apps. b6 b7C

MB confers re [] who has [] had
gone to WDC to write US Tee Manual
prev. re Ch 11 (reorgan) which was
not in focus of US Tee prog.

[] heard from someone (not recalled
but not [] - not either. Was []
that [] wd go to WDC to work on
I. Didn't like for 2 reasons: 1)
[] needed in NY in view of []
pending depen in [] level; 2) []
for a Tee to get involved in another
Tee's cases. b6 b7C

Sure that never discussed the []
issue with [] has told [] that if
[] ever called him, to let [] know b6 b7C
[] never did, and [] has never
had any contact with [] re []
working on I.

[] relship w/ [] not good.
anyway, he attempted to mediate b6 b7C
a dispute bet [] & another Tee (not
[] & [] regarded [] as an
inmate.

[] reviewed 3/87 dep't testin'. b6 b7C
at p. 1, ~~re~~ testin' re I liked rules
refer to sh center a spec center.
At time, sure was I, but now, in
light, is certain was not I, but
rather [] in. At [], he there
was unusual proc of firing spec center,
he were advisors @ as well as
creditors.

Renewed dep #11:
[redacted] wd complain to [redacted] about [redacted]
interfer in both daily ops & cases. During
this time, Tees were constantly trying to
~~show~~ demand their index from DOT.
As example, [redacted] told [redacted] that IRS
wanted VPI converted. [redacted] resisted, b6
& IRS later was paid full value of b7C
indebtedness. [redacted] denies telling [redacted] this,
but [redacted] is sure that [redacted] told him.
But no recollection that [redacted] was
involved in IRS measure. [redacted] sure that
he confused [redacted] conficts re ~~dep~~ 2.
measures from [redacted] w/ IRS measure as
[redacted] to convert VPI.

Re recantation: Prior to depo, traded
phone calls, but can't link up.

Immed after depo, called [redacted] told
him re depo, & [redacted] jogged memory re b6
I + VPI. [redacted] readily agreed, & b7C
realized that he had confused the two.

Doesn't agree re [redacted] re [redacted] situation,
re [redacted]

Called [redacted] re what to do.
When gave testin, thought it was the
truth. [redacted] worked as affid
together, created record as far as [redacted]
concerned, & [redacted] signed. b6
b7C

~~Only~~ had contact w/ [redacted]
re depo testin, & that wd prepare
affid. to correct record.

Adds paren that his recantation is
not that big an issue. First, his career
w/ [redacted] re measure from [redacted] was merely
hearsay; 2nd, even if it happened, is not
sig, b/c US Tee can do no more
than return to [redacted] of re correct. An
affid as reflected in his
[redacted]

b6
b7C

is a probab that such notin' w/ denied. Esp hee [redacted] had considered him US Tee's access to info.

Re 2^d dep, 41 - ~~sub-earlier~~ his testis. Re curres w/ [redacted] discussed w/ him [redacted] desire to depose him re info re I case. Told [redacted] of have much info, & was givg thru series of med tests re prostate condition as ~~not~~ so wanted to expedite I matter. Realizes sd have spend more time reviewing facts, but preoccup w/ med probs, esp emi board sug.

Re 44-45 of 2^d dep; altho agrees w/ [redacted] re I, disagree ~~that~~ w/ [redacted] re [redacted] issue - still believes that [redacted] told him re [redacted] plans to [redacted] [redacted] to Wash.

Valid dep #2 + trial.

Re Baym's article, [redacted] recalls that [redacted] asked [redacted] to support his applic as AUS Tee. ~~TS called [redacted] [redacted] did~~ & send it to DOJ. ~~TS called [redacted] [redacted] did~~ not know of [redacted] involvement w/ I matter. [redacted] called [redacted] & asked him to reconfirm. [redacted] at a soc hunc at [redacted] home, had several curres w/ [redacted] re variety of issues. ~~to [redacted]~~ told [redacted] that the med probs w/ [redacted] hee he had disclosed issues off birds being used in unauth manner. Therefore, his appt wld up. Recalls telling him that just tell truth & every thg w/ O.K. Told [redacted]

was sorry for way things were turning out.
But spec denies any career w/ [redacted]
where [redacted] apol to [redacted] re [redacted]
involvement. Says no reason to apol.

b6
b7C

Re Burran's article, disagrees with
article, which infers that [redacted] does not
disagree w/ [redacted] [redacted] meant that
he had no probt w/ [redacted] story, he kept
no info either way - [redacted] was never
privy to [redacted] careers.

b6
b7C

Re [redacted] incident: [redacted] called &
asked if he cd get help or support. [redacted] Albarran
position: [redacted] wrote letter to aid [redacted]
[redacted] agreed wd write to AG, & have it
filed down to [redacted] Does not remember
ever disc I - altho may have disc
[redacted] interer w/ EO ok. But I was
not told this from my vid. ~~conversations~~
not at [redacted] [redacted] [redacted]

b6
b7C

No careers. re I.

[redacted] [redacted] careers; she called
before first dep, to see if [redacted] wd talk to
[redacted] Recalls telling her same story
as in first dep, i.e. that [redacted] had
measures on him & ~~first case~~ careers I.
But that was before first dep.

b6
b7C

[redacted] has seen [redacted] at several social
& prof events. Suly of I & [redacted] never
came up; had it done so, [redacted] wd have
walked away, hee has had bill of I.

b6
b7C

Interview by [redacted]

Counsel in Surg TT

74-330-1A-6

2

Field File No. 74-330

Serial # of Originating Document _____

OO and File No. _____

Date Received _____

From _____
(Name of Contributor)

(Address of Contributor)

By (State)
(Name of Special Agent)

To Be Returned ☐ Yes ☐ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules
of Criminal Procedure ☐ Yes ☐ No

Title:

POSSIBLE PERJURY
OO: WMAFD

Reference: _____
(Communication Enclosing Material)

Description: ☐ Original notes re interview of

Investigative Notes

74-330-151

[redacted] } Perjury
Perjury

b6
b7C

INSLAW - attys [redacted]

HADRON

[redacted]

1. [redacted]
2. [redacted]
3. [redacted]

US Trustees

b6
b7C

*
subs
*

[redacted]

Alleg of Perjury

① [redacted] info re pressure on [redacted] was accurate &
+ [redacted] covered up; [redacted]

b6
b7C

② If [redacted] orig story re pressure [now claims true] is true, then committed perjury at trial re recant.

OOJ - not pursued

8

Field File No. 74-330

Serial # of Originating Document _____

OO and File No. _____

Date Received _____

From _____
(Name of Contributor)

(Address of Contributor)

By _____ State)
(Name of Special Agent)

To Be Returned ☐ Yes ☐ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules
of Criminal Procedure ☐ Yes ☐ No

Title: _____

POSSIBLE PERJURY
OO:WMFO

Reference: _____
(Communication Enclosing Material)

Description: ☐ Original notes re interview of

Investig Notes

b6
b7C

b6
b7C

OUTLINE

- I Bkgd of INS. ^{relationship &} BR litig.
- II [] ^{meets w/} []
[] allegations
- III Testim of other Lbs under oath & trial
- IV Judgment & Findings
- ~~REDACTED~~
- V INSL req investig
DOJ auth investig ation
- DE Analyzed by []
- VI Leads

b6
b7c

DOT

1. Ref 3/17/88 a lth [redacted] 1 dr dr [redacted]

a. p. 5 - Where [redacted] ass'd?

b6
b7C

b. "✓ Where [redacted] notes of
[redacted] report re [redacted]
stand to [redacted]

c. " - [redacted] notes re report of
[redacted] re [redacted] shirts.

b6
b7C

d. " - [redacted] notes re shirt
of [redacted] to [redacted]
on 3/24/87

2. ^{Pb - + testimony}
a. Notes of INS. engr [redacted] re telcal^{b6}
from [redacted] re conversion to Chr 7. ^{b7C}

2. Check on [redacted] testimony re [redacted]
calls to [redacted] immediately after [redacted] dep^s
[redacted] next day).

b6
b7C

3. Need [redacted] testimony re "11-7" note [NEXIS p 51]

DOJ APPEAL BRIEF

291

[] et held that [] alleged efforts
to have [] file a motion to compel I^{b6}
[] [] state to []^{b7C}

+ []
CINSLAW Exp'r) wd not make it in ch 11
+ [] consider input w/ DOJ.

2/7/85- INSLAW files in BR ~~up~~ cl 11

6/10/86- INSLAW files copied in BR & vs DOJ

3/17/87- [] met w/ [] & CUNIFF
in bldg. [] said [] claimed pressured by []
[] to conceal or dismiss INSLAW BR prob.^{b6 b7C}

3/26/87- [] depor.; denied would re
measure to conceal/dismiss INS BR prob.^{b6 b7C}

6/1-2/87- [] testim in BR court.
Recanted testi re

12/18/87- DOJ/OPR recom hr DAG to hire []^{b6 b7C}

6/4/88- [] resigns per agrmt []^{b6 b7C}

alt → letter, 3/17/88

b6
b7C

1. 3/25/87 depo: told him pressured
to convert I

2

Interview

a) Did tell on 3/18/87

b) " " " sure dep b6
b7C

c) " " " 3/20/87

d) " " " 3/24/87

Inter 3

2/18/85 - DOJ
telecall
w/ Notes say

DOJ officer

b6
b7C

" talked to
" No way " will be 7."

✓ testimony 4

INSLAW notes/testim
that o/a 2/18 advised that "we
talked to the Tees - no " but wba 7".

b6
b7C

✓ testimony 5
interview

2/85 notes of notes re possible
conflicts

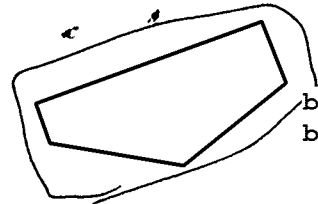
b6
b7C

Inter

6. 7/11/87 covers at house between
tells that telling
notly; that recanted to make it easier;
that told that had confused
w/ another case.

[redacted]

ed al



b6
b7c

(74-330)







5 ER

1. ~~5/2/88~~ - Memo, AAG Crim → Dir: Reg. in Inv.
2. 5/11/88 - A/T, HQ → WFO, reg. invest.
3. 5/18/88 - Memo, PTR → File re DOJ contact; ~~re DOJ~~ b6 b7c
4. NEXIS Search - sub D
5. 7/25/88 - Memo, PTR → File re OPR contact
6. 7/28/88 - Memo, RDC → File re reassg. to PRW
7. 9/8/88 - Newspaper clipping chg out
8. 8/18/88 - Insert, PRW, re mtg w/ [redacted] DOJ
9. 9/9/88 - LHM
10. 9/9/88 - A/T, WFO → HQ re update
11. 9/22/88 - ~~A/T~~, WFO → Dir re [redacted] testm to Senate b6 b7c
12. 9/13/88 - 302, [redacted] OPR
13. 9/20/88 - 302, [redacted] OPR
14. 9/20/88 - 302, [redacted] DOJ
15. 10/8/88 - T/T, WFO → HQ, NY
16. 9/15/88 - INSERT re mtg w/ DOJ AHy [redacted]
17. 10/7/88 - T/T, same as #15
- 17a. 10/24/88 - 302, [redacted] US Tee b6 b7c
18. 10/11/88 - Pub Corrup Data Form
19. 10/14/88 - INSERT re mtg w/ DOJ AHy [redacted]
20. 10/19/88 - 302, WM [redacted]
21. 10/20/88 - 302, [redacted] AUSA
22. 10/20/88 - 302, [redacted] vs Ci J.
- 23.



b6
b7C

THINGS TO DO

- ✓ 1. Insert
- ✓ 2. Confirm prosec opin to DOJ
3. Review transcr/docum
4. Await DOJ letter to  via atty 
5. Set leads re interv of 
 ✓ re authority
- ✓ 6. Contact DOJ/OPR re memos/notes of inter
w/  etc.
- ✓ 7. Create sub files for testin of ea
subject & media articles.
- ✓ 8. A/T to HQ
9. TT to Bureau re awaiting  testimony

b6
b7C

b6
b7C

~~CONFIDENTIAL~~
~~NOT C-11~~
~~THY C-5~~
C-2

TRANSMIT VIA: Airtel

CLASSIFICATION: _____

DATE: 5/11/88

FROM: Director, FBI

TO: SAC, WMFO

[Redacted]

[Redacted] PERJURY;
OO: WMFO

b6
b7C

Enclosed for WMFO is a copy of a self-explanatory memorandum from [Redacted] Acting Assistant Attorney General, requesting that the FBI conduct an investigation into allegations of [Redacted]

WMFO is requested to have the assigned case Agent promptly contact Departmental Attorney [Redacted] Public Integrity Section, at [Redacted] and keep FBIHQ informed of all pertinent developments.

Enclosure

11

GENERAL INDEXED	[Redacted]
<input checked="" type="checkbox"/> Admin. & Search	
<input type="checkbox"/> [Redacted]	

b6
b7C

74-330-2

[Redacted]

[Redacted]

[Redacted]

FBI/DOJ

MEMORANDUM

To: SAC, WMFO (74-330) (P) (C-2)

Date: May 18, 1988

From: SA [redacted]

b6
b7C

[redacted]
POSSIBLE PERJURY;
OO: WMFO

Re DOJ Criminal Division memo from Acting AAG JOHN C. KEENEY to FBIHQ dated 5/2/88 titled "Request for Investigation: Allegations by INSLAW".

b6
b7C

On 5/17/88, SA [redacted] met with DOJ/PIS Attorney [redacted] who provided overview information as follows:

INSLAW received a DOJ computer software contract through DOJ procurement rather than GSA procurement at a time when INSLAW had no other client base beyond DOJ. It is not clear how, why, or through whom INSLAW landed the contract, but by 1983, their performance was found unsatisfactory within DOJ. [redacted] noted that she personally had heard comments from a non-DOJ statistical expert before the INSLAW situation became an issue that their work was not considered good when they were performing on a not-for-profit basis under LEAA funding. Further, former AAG D. LOWELL JENSEN had a "long-standing dislike" for INSLAW from his days as a D.A. in Alameda County, California, where the prosecutors' office had case tracking software on-line. JENSEN's criticism of INSLAW was set forth in a book he wrote on the subject published in 1980--again long before the current INSLAW allegations became an issue.)

b6
b7C

INSLAW apparently looked at the \$40 million PROMIS contract as a leg up to bigger DOJ projects. Even Judge BASON, who ruled in favor of INSLAW in its civil suit against the DOJ, conceded that INSLAW was in partial performance default under its contract.

On or about 4/20/83, INSLAW owner WILLIAM HAMILTON was telephoned by [redacted] Chairman of HADRON CORP., saying he planned to buy INSLAW. HAMILTON claims that when he told [redacted] he was not interested in selling, [redacted] told him he had ways to make him sell. HADRON becomes pertinent insofar as [redacted] a part-owner of HADRON and its wholly owned subsidiary ACUMENICS, is a friend of [redacted] was still a White

b6
b7C

2-WMFO

74-330-13

SEARCHED	INDEXED
SERIALIZED	FILED
MAY 19 1988	
FBI - WASH. FIELD OFFICE	

House advisor in 1983 [REDACTED]

b6
b7C

[REDACTED] ACUMENICS later received a \$40 million software contract servicing the DOJ Lands Division--not PROMIS--after INSLAW was found unsatisfactory.

With virtually no other client base besides DOJ, INSLAW filed for bankruptcy protection around February, 1985. INSLAW also filed a second action in civil court--ancillary to the bankruptcy--suing DOJ for damages. That case was filed and heard in 1986. The bankruptcy matter was ruled on in February, 1987. In an unusual manner, the bankruptcy court viewed the civil suit inseparable from the bankruptcy matter and heard them together. Much of the possible perjury comes out of the suit rather than the bankruptcy proceeding.

In his ruling, Judge BASON did not go so far as using the word "lied," but his opinion incorporates phrasing such that he found some of the testimony incredible and utterly unbelievable. BASON made no criminal referral for perjury, though, as far as [REDACTED] is aware. BASON was not reappointed to the bankruptcy bench shortly after the ruling, and he filed litigation against the District Court judges over their failure to reappoint him. His case was dismissed.

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b7C

BASON's successor, Judge MARTIN TEEL, JR., has yet to set the amount of punitive damages against DOJ in the civil suit. INSLAW, meanwhile, is appealing its bankruptcy liquidation in U.S. District Court before Judge WILLIAMS B. BRYANT.

Based on Judge BASON's opinion, DOJ OPR began an

[REDACTED]

b6
b7C

[REDACTED] had a long history of in-office frictions between him and his boss. [REDACTED] At some point,

[REDACTED] believes [REDACTED] has been contacted by staffers of Sen. SAM NUNN who is planning a committee hearing. Sens. RUDMAN and DODD also are interested in conducting hearings.

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b7C

The issue of perjury focuses on whether or not [REDACTED] attempted to exert undue influence on the trustees assigned to

INSLAW's bankruptcy to convert or liquidate. [] has consistently denied attempting to influence the trustee's decision. The only other witness whose testimony has been consistent is the trustee himself, [] out of the Alexandria U.S. TRUSTEES field office. [] was the one assigned to handle INSLAW's bankruptcy. [] was Trustee then at the New York field office. At some point, [] directed [] assistant, [] to be detailed from New York to assist on the INSLAW case. There is confusion as to whether [] was supposed to go to Alexandria to work with [] directly or to go to the EXECUTIVE OFFICE OF U.S. TRUSTEES in D.C. [] contends he wanted [] at the EXECUTIVE OFFICE. [] apparently understood the detail was to Alexandria. Judge BASON apparently construed that [] wanted to hand pick someone [] he could direct. At some point during deposition, [] said [] did suggest conversion or dismissal of INSLAW's bankruptcy in discussing [] possible reassignment. In court, [] testified there was no pressure from [] as did []

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b7C

[] shares [] view that [] is an abrasive personality. [] met yesterday (5/16/88) with [] at which time she told him [] is a subject of this criminal perjury investigation. [] is the only one who has been informed by [] so far that he is a subject. [] said [] position is that his full current recollection of events is what is on the record. [] will consider reviewing anything that might refresh his memory. He has no particular reason to lie for [] and he will consent to an interview. [] expressed a preference to have [] interview [] but was agreeable to interview by the FBI. [] currently is being scheduled for interview by NUNN Committee staffers.

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b7C

INSLAW owners [] have alleged obstruction of justice in addition to perjury. The obstruction hinges on what they say was interference in their right to counsel. (This issue was the focus of a story by reporter RITA BRAVER on the CBS EVENING NEWS last week.) Attorney [] was fired from his law firm, [] while representing INSLAW. He told the [] he was fired for failure to control the client--INSLAW. [] believed one of the firm's senior partners, [], was responsible and that [] did it in retaliation for naming [] in the civil suit. [] was [] personal attorney in 1984 (and represented [] in a matter involving [] which [] friend and investment trustee [] is of counsel to the DICKSTEIN SHAPIRO firm. [] absolutely denied any DOJ influence in his decision to dismiss []. He denied having any conversation at all with [] about []--as was alleged apparently. [] could not recall what [] may

b6
b7C

have said concerning any discussions with []

Both Judge BASON and [] have approached Special Prosecutor [] to bring these issues into [] investigation of [] determined the INSLAW issues are unrelated to the matters of his investigation and would not add them.

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b7C

[] was assigned in late February, 1988, to handle the evidence review necessary to determine whether a separate independent counsel should be requested for the INSLAW allegations stemming from "Inslaw, Inc. v. United States of America and the United States Department of Justice". That sort of preliminary inquiry was under a 15-day deadline to determine whether there was enough factual evidence to warrant a special prosecutor. [] did not find sufficient factual evidence to recommend such a request. On the fifteenth day, however, INSLAW's attorneys-- [] --came to [] to press for a perjury investigation of [] independent of what OPR was doing.

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b7C

Former AAG WILLIAM WELD signed the finding, accepting [] recommendation not to go to an independent counsel on the questions raised concerning both obstruction of justice and perjury. [] recommended pursuing a criminal perjury investigation against [] based on [] admission. [] did not recommend pursuing a criminal OOJ investigation based on [] wholesale denial.

b6
b7C

[] were interviewed by OPR. [] decision was forwarded to OPR with a caveat that any additional information developed be furnished to this criminal investigation.

[] advised on 5/16 when contacted by telephone to set an appointment with SA [] that she had not thought about notifying Judges BRYANT and TEEL of this perjury investigation. During the meeting on 5/17, [] inquired whether judicial notification was only an FBI policy or what. [] was shown a copy of MIOG Part I, 74-2.1.3 concerning FBI policy which may or may not emanate from AG Guidelines. [] advised she wanted to ask around at DOJ before determining whether she would notify the two judges. This situation was brought to the attention of SSA [] FBIHQ, on 5/17/88 who will be advised if [] determines against notifying the judges.)

b6
b7C

[] furnished copies of the following documents for SA [] to review:

- a. Non-confidential version of Judge BASON's opinion in the bankruptcy/civil suit proceeding;

- b. Letter summarizing allegations dated 2/12/88 from [redacted] to [redacted] Deputy Chief, PIS, DOJ;
- c. Affidavit of [redacted] dated 3/26/87;
- d. Deposition of [redacted] taken 3/25/87;
- e. Deposition of [redacted] taken 5/22/87;
- f. Court transcript pages 653-728 of testimony of [redacted] (undated);
- g. Deposition of [redacted] taken 3/23/87;
- h. Deposition of [redacted] taken 4/27/87;
- i. Deposition of [redacted] taken 3/23/87;
- j. Deposition of [redacted] taken 3/26/87;
- k. Court transcript of pages 311-368 of testimony of [redacted] (undated);
- l. Memo dated 12/18/87 from [redacted] OPR, to ARNOLD I. BURNS, Deputy AG, re Allegations of Misconduct on the Part of [redacted]
- m. Letter dated 3/17/88 from Attorney [redacted] to ARNOLD I. BURNS, Deputy AG, re [redacted]

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b6
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LEADS:

WMFO at Washington, D.C.:

1. Will obtain assurance from [redacted] that Judges BRYANT and TEEL are both notified of the allegations and are agreeable to this perjury investigation.
2. Will review the above listed documents.
3. Will contact [redacted] and/or [redacted] at OPR [redacted] for a list of all individuals interviewed to date in connection with this matter and the results of interviews. Will also obtain from OPR copies of depositions/affidavits/transcripts beyond those provided by [redacted]
4. Will interview [redacted] and request his submission to FBI polygraph examination.

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File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 74 330 Date 9-14-88
Class. Case No. Last Serial

☒ Pending

☐ Closed

Serial No.

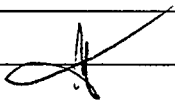
Description of Serial

Date
Charged

4

Permanent Charge out
of NEXIS computer
search dt 9-8-88
to 74-330 sub D

9-8-88



Supv

Employee

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged

Employee

Location

Memorandum

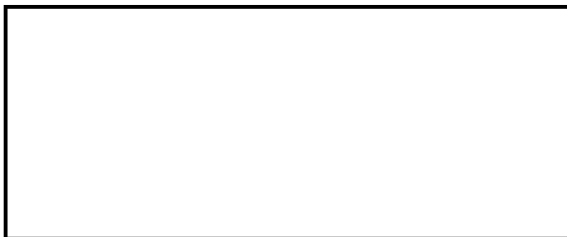


To : SAC, WMFO (74-330) (P)

Date 7/28/88

From : SSA [redacted] (C-2)

Subject :



POSSIBLE PERJURY;
OO:WMFO

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b7C

On 7/22/88, writer was telephonically contacted by [redacted] Trial Attorney, Public Integrity Section (PIS), U.S. Department of Justice, telephone [redacted] regarding captioned matter. After identifying himself, [redacted] stated he had been reassigned the INSLAW investigation. [redacted] advised writer he had been informed by SA [redacted] that captioned matter was to be reassigned due to her current work load and [redacted] was inquiring as to when he might expect to be contacted by the new case agent. Upon being questioned by the writer as to his prosecutive opinion regarding captioned matter, [redacted] responded it was a "unlikely case, as a case to be made, however, it's something that has to be done and needs to be done with some promptness." Writer informed [redacted] he had requested a summary memorandum from SA [redacted] and was in the process of reviewing that material for reassignment to another agent.

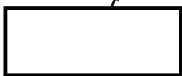
Q b6
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On 7/27/88 writer telephonically recontacted [redacted] and informed him captioned matter would be reassigned to SA [redacted] who was reporting to Squad C-2 effective 8/15/88. Writer assured [redacted] that SA [redacted] would make his initial contact with him during the week of 8/15/88. [redacted] agreed to that time frame and stated there was nothing within the case which required handling prior to that date.

11/10/88
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✓-WMFO

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Reassign 7/28/88
SA [redacted]
[redacted]

74-330 6

SEARCHED	INDEX
SERIALIZED	FILED
JUL 28 1988	
FBI - WMFO	

74-330 8

SEARCHED

INDEXED

SERIALIZED

FILED

SEP 08 1988

FBI - WASH. FIELD OFFICE

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b7C

WMFO 74-330

[redacted] [redacted]
On August 18, 1988, Special Agent (SA) [redacted]
[redacted] C-2, WMFO, met with DEPARTMENT OF JUSTICE (DOJ),
Public Integrity Section (PIS), Attorney [redacted]
in regard to subject case.

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The facts of the case were discussed generally. The problem with the case is keeping it narrowly focused on the issue of perjury, since there are other aspects (e.g.) Congressional hearings; civil appeal, etc.). However, the PIS/FBI interest focuses on the perjury/subornation of perjury allegations. Subject [redacted] has previously testified that he had fabricated the information about a conspiracy to injury INSLAW. However, he has recently made out of court allegations, as has his attorney, that there was a conspiracy to liquidate or otherwise injury INSLAW.

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It was discussed with [redacted] that even if [redacted] recants his prior testimony and realleges a conspiracy to damage INSLAW, thereby raising perjury allegations, the case against him, and subjects [redacted] may be difficult to prove, since his [redacted] credibility would be seriously questioned, and there may be no other witnesses to this alleged conspiracy.

But if [redacted] implicates other subjects, and passes an FBI polygraph, and other evidence indicates the existence of perjury or subornation of perjury, [redacted] advised that the Public Integrity Section will strongly consider prosecution.

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It was discussed and agreed that the following investigative actions will be taken initially:

1. FBI
 - a. Complete transcripts/document analysis.
 - b. Interview [redacted] (by his attorney [redacted]) The attorney will probably request immunity for his client; we will then request a proffer of expected testimony and require a consent to a polygraph subsequent to interview.

- c. Set leads to interview U.S. COURT OF APPEALS [redacted] regarding whether [redacted] said anything to them regarding pressure by [redacted] et al to liquidate INSLAW.
 - d. Contact DOJ/OPR regarding memos or notes of their interviews with [redacted] or relevant persons.
 - e. Prepare a confirmatory letter to DOJ regarding this meeting and DOJ'S prosecutive opinion.
2. DOJ
- a. Will contact DOJ Office of Legislative Affairs(OLA) to insure that we are advised of scheduled congressional testimony regarding INSLAW by the subjects or other relevant persons.
 - b. Will write [redacted] attorney [redacted] regarding whether his client will agree to submit to an FBI interview and polygraph.

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File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 74 330 Date 9/15/88
Class. Case No. Last Serial

☒ Pending

☐ Closed

Serial No.

Description of Serial

Date
Charged

7

Permanent charge

9-8-88

Out of newspaper

clipping dt 8-12-88

to 74-330 SUB D

A

Supv

Employee

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

Washington Metropolitan
Field Office
September 9, 1988

[REDACTED]

POSSIBLE PERJURY

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The predication for this investigation was a complaint made by attorneys for INSLAW, INC., a former contractor for the Department of Justice, to the Department of Justice Public Integrity Section on or about February 26, 1988. The complaint alleged that former [REDACTED] and former [REDACTED] perjured themselves in testimony regarding bankruptcy proceedings involving INSLAW, and that subsequently [REDACTED] suborned [REDACTED] perjury. Central to the allegations are deposition and/or trial testimony on two matters: First, whether [REDACTED] pressured [REDACTED] to convert the INSLAW bankruptcy from a Chapter 11 (reorganization) to a Chapter 7 (liquidation) case; and second, whether [REDACTED] pressured [REDACTED] to send his [REDACTED] from New York to Washington, D.C. to work on the INSLAW case.

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On May 2, 1988, Acting Assistant Attorney General John C. Keeney, Criminal Division, requested that the Federal Bureau of Investigation open a criminal investigation on the allegations. On May 17, 1988 the facts of this case were discussed generally between Public Integrity Section Attorney [REDACTED] and FBI Special Agent [REDACTED]

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On August 18, 1988, this case was further discussed between Public Integrity Section Attorney [REDACTED] and FBI Special Agent [REDACTED]. In addition to going forward with the perjury investigation of [REDACTED] and [REDACTED] requested that the investigation also focus on the testimony of [REDACTED]

4-Bureau
✓ 2-WMFO
1-Public Integrity Section, Criminal Division, DOJ
Attention: [REDACTED]

[REDACTED]

()

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SEARCHED	INDEXED
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FBI - WASHINGTON	

[REDACTED]

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WMFO 74-330

[redacted] who has previously testified that he fabricated information about a conspiracy to injure INSLAW. However, he has recently recanted and made out of court allegations, as has his attorney, that there was a conspiracy to liquidate or otherwise injure INSLAW.

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In view of proposed hearings by the Senate Permanent Subcommittee on Investigations, [redacted] agreed to contact the Department of Justice Office of Legislative Affairs (OLA) to insure that Public Integrity and the FBI are advised of scheduled Congressional testimony by the subjects or other relevant persons regarding the INSLAW matter.

AIRTEL

9/9/88

TO: DIRECTOR, FBI
ATTN: PUBLIC CORRUPTION UNIT,
WHITE COLLAR CRIMES SECTION

FROM: SAC, WMFO (74-330) (P) (C-2)

[REDACTED]
POSSIBLE PERJURY;
OO:WMFO

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Enclosed for the Bureau are the original and three copies of an initial letterhead memorandum regarding subject case.

For the information of the Bureau, WMFO has received from the Public Integrity Section, Department of Justice, extensive transcripts of deposition and trial testimony of the subjects and other relevant persons involved in the INSLAW bankruptcy case. These transcripts are currently being reviewed and extracted into digest format. Once this is accomplished and inconsistent and possibly perjurious testimony is identified, further leads will be set.

Public Integrity Section attorney [REDACTED] discussed with WMFO case Agent that even if subject [REDACTED] recants his prior testimony and now alleges a conspiracy to injure INSLAW (thereby raising perjury allegations as to himself and the other subjects) the case would be very difficult to prove since [REDACTED] credibility would be seriously in question and the other testimony is virtually uniformly consistent that there was no conspiracy to injure INSLAW. However, if [REDACTED] implicates other subjects, passes an FBI polygraph, and other evidence indicates the existence of perjury or subornation of perjury, [REDACTED] [REDACTED] advised that the Public Integrity Section will consider prosecution.

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2-Bureau (Enc. 4)
2-WMFO (74-330) (Enc. 2)

[REDACTED]
(4)

74-330

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[REDACTED]	[REDACTED]
[REDACTED]	

WMFO 74-330

[] has advised WMFO case Agent that the DOJ Civil Division brief filed on 6/17/88 in the appeal of the adverse judgment against DOJ in the INSLAW case contains a statement referring to a criminal investigation concerning the veracity of subjects [] in their testimony. [] advised that this statement in the brief satisfies the requirement that the judge be informed of the criminal investigation (MIOG Part I, Para. 74-2.1.3). [] further stated that there is no requirement to make particularized notification to the U.S. Bankruptcy Court, Washington, D.C.

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LEADS

WMFO AT WASHINGTON, D.C.

Will review and extract pertinent portions of deposition and trial testimony prior to setting additional leads.

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Searched	
Serialized	
Indexed	
Filed	

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/21/88

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[redacted] was telephonically contacted at his place of employment in Reston, Virginia. After being apprised of the interviewing agent's identity, he was advised that the purpose of the interview was to discuss possible inconsistent statements of [redacted]

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[redacted] advised that he was formerly assigned to the [redacted] United States Department of Justice. In that capacity, he was an attorney working on the INSLAW civil matter.

He advised that [redacted] is a private practice attorney in New York, who is a friend of [redacted]. He believes that INSLAW tried to retain [redacted] to discuss with [redacted] the Department of Justice contract and pressure on the United States trustees, both subjects for which [redacted] might have some information. [redacted] feels that [redacted] may have told about pressure on the United States Trustees to convert the INSLAW case to a liquidation, because that is what he believed at the time.

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Shortly thereafter, at his deposition, [redacted] again referred to this pressure. However, he later learned he had the wrong case (e.g. he referred to a "share holder's committee", when in fact there was none with INSLAW, because it was a privately held corporation). Once he realized his mistake, he recanted his testimony by submission of an affidavit the day after his testimony.

[redacted] stated that once he learned of [redacted] deposition testimony he called [redacted] attorney about the discrepancy. He wanted to know from this attorney if [redacted] was telling the truth, that there had been no conspiracy to liquidate INSLAW. [redacted] attorney advised [redacted] that [redacted] was telling the truth and that [redacted] was mistaken. [redacted] did not request [redacted] attorney or [redacted] to contact [redacted]

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[redacted] then called Assistant United States Attorney (AUSA) [redacted] of the Southern District of New York. [redacted] had represented [redacted] at his deposition. [redacted] advised that he had spoken with [redacted] attorney, and that [redacted] was consistent in his story, and that [redacted] was mistaken. [redacted] believes that thereafter [redacted] spoke with [redacted] concerning [redacted]

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Investigation on 9/20/88 at Washington, D.C. File # WMFO 74-330
by SA [redacted] Date dictated 9/21/88

Continuation of FD-302 of _____, On 9/21/88, Page 2*

testimony, and _____ came to realize that he had confused the INSLAW case with another bankruptcy matter. Thereafter, _____ filed his recanted affidavit with the court.

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_____ also recommended that interviewing Agent discuss this matter with former DOJ Attorney _____ who has also interviewed _____ in this matter.